

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

RAY HULL and KAREN K. HULL,

Plaintiffs,

V.

Case No. 04 CV-721 C (C)

**BARAN TELECOM, INC.,
WIRELESS SOLUTIONS, LLC, and
NEXTEL PARTNERS OPERATING CORP.,**

Defendants.

DEFENDANT’S REQUESTED VOIR DIRE

COME NOW the Defendant, Baran Telecom, Inc., and submits its requested voir dire as follows:

1. For each juror, state his or her occupation and the same information regarding his or her spouse.
2. Have any of you ever been a party to a lawsuit?
3. Have any of you ever sat on a jury panel before? If so, when and what type of case?
4. Will all members of the jury panel agree to follow the law as given you by the court whether or not you agree with that law or believe it to be a “good” law?
5. Have any of you ever worked for Baran Telecom, Inc., or do any of you have any relatives that have worked for Baran Telecom, Inc.?
6. (If anyone answers in the affirmative) Is there anything about that association with Baran Telecom, Inc. that will make it impossible for you to give Baran Telecom, Inc. a fair trial in this case?
7. Do any of you feel that the mere fact that the Defendant has been sued means that it must have done something wrong?

8. Do any of you have any feelings or beliefs towards the parties, attorneys or witnesses where you might be biased or prejudiced either in favor of or against those persons?
9. Has anyone ever worked in construction?
10. Does anyone have relatives who are or have worked in construction?
11. Is there anything about your experience or your relatives' experience which might cause you to be biased or prejudiced toward either the Plaintiffs or the Defendants in this case?
12. Have any of you had experiences involving a construction company that will make it impossible for you to give either the Plaintiffs or Defendant a fair trial in this case?
13. Has anyone ever been involved in a construction accident?
14. Has anyone ever been involved in an on the job injury?
15. Describe the nature of the accident.
16. Is there anything about that event that might influence your ability to be fair to the Plaintiffs or Defendants in this case?
17. This case involves an accident whereby Plaintiff was constructing a cellular phone tower in Fremont, Nebraska with the use of a gin pole. Plaintiff attached the gin pole to the tower and then climbed the gin pole. The gin pole came loose from the cell phone tower and fell to the ground. Since Plaintiff was attached to the gin pole, Plaintiff fell as well. Does anyone have any knowledge of this accident?
18. Has anyone had any experience using or witnessing the use of a gin pole?
19. Is there anything about your experiences which might affect your ability to decide this case based upon the evidence presented in this courtroom?
20. Has anyone had any experience using safety harnesses or lanyards while working high above the ground?
21. Is there anything about your experiences which might affect your ability to decide this case based upon the evidence presented in this courtroom?
22. Will all of you keep an open mind until you have heard all of the witnesses and evidence before you make up your mind as to who is right and who is wrong?

23. If you were being sued, would you want someone to decide your case who was in the same frame of mind you are in right now?
24. Can you think of any reason why you could not serve on this jury?

Respectfully submitted,

s/Thomas A. Paruolo

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ATTORNEYS FOR DEFENDANT
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CERTIFICATE OF SERVICE

I hereby certify that on the 6th of January, 2006, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Thomas J. McGeady
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s/Thomas A. Paruolo